



RECEIVED

MAY 23 2001

REMARKS

Claims 1-23 are all the claims pending in the present application. **Technology Center 2100**

Applicants acknowledge the Draftperson's objection to the drawings filed with the application and will submit revised formal drawings when the application is allowed.

Claims 1-7, 9-13, 15-19, and 21-23 stand rejected under 35 U.S.C. §102(e) as being anticipated by Mullins (U.S. Patent No. 5,857,197). Claims 8, 14 and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Mullins in view of Ludwig et al. (hereinafter Ludwig) (U.S. Patent No. 6,006,230). Applicants respectfully traverse these rejections, and request reconsideration and allowance of the pending claims in view of the following arguments.

As a preliminary matter, Applicants note that the Office Action Summary sheet fails to acknowledge a claim for domestic priority under 35 U.S.C § 119(e). Applicants respectfully point out that the present application claims priority from provisional application 60/086,382, filed on May 22, 1998. This priority claim has been noted on the Official Filing Receipt. Accordingly, Applicants respectfully request that the Examiner provide the appropriate priority acknowledgement.

Concerning the prior art rejections, the Examiner asserts that Mullins discloses a schema adapter that maps assets to the data stored in the data store, and that this schema adapter transfers data to and from the data store. The Examiner refers to claim 1 of Mullins, at col. 35, lines 40-45, which refers to a "second adapter". Applicants respectfully disagree with the Examiner's characterization.

Mullins is directed to a system and method for accessing a data store, but does not teach transferring of data to and from the data store, as claimed in the present application. Claim 1 in

Mullins recites “a second adapter ... having a meta data map ... providing the data content from at least one data store” (emphasis added). Mullins specifically states that the use of its technology provides “read only” data stores over the Internet (Mullins at col. 7, lines 64-66). In describing this system, Mullins states that a request is passed from an application program to a first adapter 400, and then on to a second adapter 500 (Mullins at col. 7, lines 39-54). The second adapter 500 then searches a meta data map 206 using information obtained from the request to determine if a data map exists (Mullins at col. 7, lines 55-60). The Mullins system then utilizes the found meta data map and request information to access the data store to retrieve the data store content (Mullins at col. 8, lines 1-6). The data store content is then communicated back to the application program (Mullins at col. 8, lines 6-17).

Mullins is therefore describing a system that processes application requests for information, ultimately leading to the communication of data store content to a requesting application. Put another way, Mullins is simply describing a query-only system that permits the communication of stored data to an application program, and does not provide any teaching or suggestion of the transfer of data to and from a data store.

In contrast to the Mullins system, Applicant’s independent claims 1, 6, 12, and 18 specifically recite a schema adapter for mapping the assets to the data stored in the data store and for transferring the data to and from the data store in response to methods invoked by the client application. Thus, the invention recited in the independent claims provides at least one schema adapter for transferring data to and from the data store.

Thus, while Mullins provides a severely limited “read only” functionality, the present invention (claims 1, 6, 12, and 18) includes read-write capabilities since these claims recite a client application that can transfer data to and from the data store.

Applicants therefore assert that Mullins “read only” system does not teach or render obvious Applicants’ schema adapter for transferring data to and from the data store, as specifically recited in the independent claims. Accordingly, independent claims 1, 6, 12, and 18, and their respective dependencies, are patentable.

The Examiner next rejects claims 8, 14, and 20 under 35 U.S.C. §103(a) as being unpatentable over Mullins in view of Ludwig.

Applicants have demonstrated in the independent claims argument above that Mullins does not teach or suggest at least one feature that is recited in those claims. Applicants further assert that Ludwig does not supply any of Mullins’ deficiencies. Accordingly, claims 8, 14, and 20 are patentable at least by virtue of their dependence on the patentable independent claims. Thus, even if one skilled in the art were to combine the teachings of Mullins, with that taught by Ludwig, the resulting combination would not result in Applicants’ claimed invention (claims 8, 14, and 20), and therefore these claims are patentable.

The Examiner’s rejections having been overcome, Applicants submit that the subject application is in condition for allowance. The Examiner is respectfully requested to contact the undersigned at the telephone number listed below to discuss other changes deemed necessary. Applicants hereby petition for any extension of time which may be required to maintain the

AMENDMENT UNDER 37 C.F.R. §1.111  
U.S. Application No. 09/219,934



PATENT APPLICATION

pendency of this case, and any required fee for such extension is to be charged to Deposit Account

No. 19-4880.

RECEIVED

MAY 23 2001

Respectfully submitted,

Technology Center 2100

Frank L. Bernstein  
Registration No. 31,484

SUGHRUE, MION, ZINN,  
MACPEAK & SEAS, PLLC  
(650) 325-5800



23493

PATENT TRADEMARK OFFICE

Date: May 14, 2001

Certificate of Mailing

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to:

Assistant Commissioner for Patents  
Washington, D.C. 20231

Date: May 14, 2001

Signed: Thea K. Wagner  
Thea K. Wagner



AMENDMENT UNDER 37 C.F.R. §1.111  
U.S. Application No. 09/219,934

PATENT APPLICATION

APPENDIX

VERSION WITH MARKINGS TO SHOW CHANGES MADE

RECEIVED  
MAY 23 2001  
Technology Center 2100

IN THE SPECIFICATION:

The specification is changed as follows:

**Page 1, third paragraph:**

Serial No. [ ] 09/219,933, entitled "A Configurable And Extensible System For Deploying Asset Management Functions To Client Applications" to William J. Baer, I-Ming Kao, Pedro Jacob, Janet L. Murray, Deidra S. Picciano, Jerry D. Robertson and James A. Willey;

**Page 1, fourth paragraph:**

Serial No. [ ] 09/220,291, entitled "Method And Apparatus For Dynamically Customizing And Extending Functions Of A Server Program To Enable And Restrict Functions Of The Server" to William J. Baer, I-Ming Kao, Pedro Jacob, Janet L. Murray, Deidra S. Picciano and Jerry D. Robertson; and

**Page 1, fifth paragraph:**

Serial No. [ ] 09/220,293, entitled "Method And Apparatus For Configurable Mapping Between Data Stores And Data Structures And A Generalized Client Data Model Using Heterogeneous, Specialized Storage" to William J. Baer, I-Ming Kao, Pedro Jacob, Janet L. Murray, Deidra S. Picciano and Jerry D. Robertson.